

**IN THE UNITED STATES DISTRICT COURT
SOUTHERN DISTRICT OF OHIO
EASTERN DIVISION**

JANE DOE S.W., an individual,	:	
Plaintiff,	:	Case No. 2:19-cv-1194
vs.	:	Judge Algenon L. Marbley
LORAIN-ELYRIA MOTEL, INC., <i>et. al.</i> ,	:	Chief Mag. Judge Elizabeth P. Deavers
Defendants.	:	JURY DEMAND ENDORSED HEREIN

**DEFENDANT SRI RAM, LLC (dba ECONOMY INN)’S ANSWER
TO PLAINTIFF’S COMPLAINT, DOC. 1**

Now comes Defendant SRI Ram, LLC (hereinafter “SRI Ram”), by and through counsel, and for its Answer to Plaintiff’s Amended Complaint (Doc. 1) states as follows:

1. From the outset, SRI Ram has taken steps to prevent incidents of both human trafficking and other criminal activity on its premises. Such actions include, but are not limited to, installing and monitoring security cameras, renting rooms only to those who provide valid identification, maintaining the information from the provided identification for five years, and working and cooperating with law enforcement upon request during their inquiries. Further, the owners of the Economy Inn hotel identified in Plaintiff’s Complaint live on the grounds of the hotel full-time, routinely monitor those grounds, and have a vested interest in keeping the premises safe and secure for not only themselves, but their customers and the general public. The hotel is owned and operated by SRI Ram, LLC which is a family-owned business. It has been operating for approximately twenty years and has been under current ownership for approximately twelve years. The Economy Inn business located at 1070 Graham Road in Cuyahoga Falls, Ohio is run

by a husband and wife team who are proud of the business they independently own and operate. This husband and wife team have raised their own two children on the hotel premises and, as a result, have been diligent in maintaining a safe place for their own children as well as the customers of the hotel. SRI Ram previously worked with local county officials to provide temporary housing to people in need due to social and economic challenges in furtherance of local community interests and in the interests of charity and humanity. This particular hotel currently maintains a 4.3 out of 5 rating on “expedia.com” and an 8.1 out of 10 rating on “booking.com.”

2. Responding to paragraphs 1, 2, 6, 10, 11, 12, 13, 16, 17, 19, 20, 21, 22, 23, 24, 25, 26, 27, 28, 29, 30, 31, 32, 33, 34, 35, 36, 37, 38, 39, 40, 41, 42, 43, 44, 45, 46, 47, 48, 60, 61, 62, 63, 64, 65, 66, 67, 68, 69, 70, 71, 72, 73, 74, 75, 76, 77, 78, 79, 81, 82, 83, 87, 92, 93, and 103 of Plaintiff’s Complaint, SRI Ram states that said paragraphs contain legal conclusions, opinions, and/or allegations against or concerning third parties over which SRI Ram has no authority, control, or right of control. To the extent said paragraphs are deemed to allege facts against or concerning SRI Ram, said paragraphs are denied.

3. SRI Ram denies the allegations set forth in paragraphs 3, 5, 88, 89, 90, 94, 95, 96, 97, 98, 99, 100, 101, 104, 106, 107, 108, 109, 11, 113, 114, and 115 of Plaintiff’s Complaint.

4. SRI is without sufficient knowledge to admit or deny the allegations set forth in paragraphs 4, 50, 51, 52, 53, 54, 55, 56, 57, and 110, of Plaintiff’s Complaint and, therefore, denies the same.

5. SRI Ram does not contest jurisdiction and venue as set forth in paragraphs 7 and 8 of Plaintiff’s Complaint.

6. Responding to paragraphs 14 and 15 of Plaintiff’s Complaint, SRI Ram states that it is a limited liability corporation that operates an independent hotel doing business as “Economy

Inn” that is located at 1070 Graham Road in Cuyahoga Falls, Ohio and that there are multiple other hotels also doing business as “Economy Inn” in Ohio and across the country that are wholly independent of and in no way affiliated with SRI Ram, LLC or the business operated by SRI Ram. SRI Ram denies the remaining allegations in said paragraphs.

7. Responding to paragraphs 85a, 86a and 85b¹, SRI Ram states and avers that it operates a business under the fictitious name “Economy Inn” in Cuyahoga Falls and is not a representative or operator of any other business known as “Economy Inn.” Furthermore, the “prior employee Bennett” identified in Plaintiff’s Complaint is not and has never been an employee of the Economy Inn located in Cuyahoga Falls. Rather, “prior employee Bennett” is an employee of a hotel located in Louisville, Kentucky that also does business under the name “Economy Inn.”² The representation by Plaintiff that “prior employee Bennett” has any connection with SRI Ram is incorrect and misleading. SRI Ram denies the remaining allegations contained in said paragraphs.

8. Defendant SRI Ram, LLC denies all remaining allegations not expressly admitted to be true herein.

First Defense

9. Plaintiff’s summons is or may not be not sufficient.

Second Defense

10. Plaintiff failed to properly perfect service upon Defendant.

¹ It should be noted that Plaintiff’s Complaint contains two paragraphs numbered 85 and two paragraphs numbered 86. For purposes of this Answer, those paragraphs will be identified as 85a, 85b, 86a, and 86b, respectively.

² See <https://insiderlouisville.com/economy/inside-economy-inn-documents-show-underage-prostitution-at-troubled-motel/>

Third Defense

11. Plaintiff has failed to state a claim upon which relief may be granted.

Fourth Defense

12. Plaintiff failed to mitigate her damages in whole or in part.

Fifth Defense

13. Some or all of Plaintiff's claims are or may be outside of the applicable statutes of limitations and as such Defendant is not liable.

Sixth Defense

14. Defendant did not have actual, implied, or constructive knowledge of Plaintiff's circumstances and/or the conduct or activities of Plaintiff's alleged trafficker and, as a result, was unable to intervene, address, report, or prevent the same.

Seventh Defense

15. Plaintiff's Complaint fails to join a party or parties necessary for just adjudication or as required by law.

Eighth Defense

16. Plaintiff's claims and damages are the direct and proximate result of intentional, reckless, negligent and/or criminal acts of others over whom Defendant has no right or obligation to control and for which Defendant is not liable to Plaintiff.

Ninth Defense

17. Plaintiff's claims are barred by the doctrine of laches and or estoppel.

Tenth Defense

18. Defendant hereby reserves the right to assert any additional avoidance or defense for which discovery reveals a basis.

WHEREFORE, Defendant asks the Court to deny all of Plaintiff's claims and requests for relief, dismiss this action.

Respectfully submitted,

/s/ Matthew S. Teetor

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JURY DEMAND

A trial by jury comprised of the maximum number of jurors permitted by law is hereby demanded.

/s/ Matthew S. Teetor

Matthew S. Teetor (0087009)

CERTIFICATE OF SERVICE

I hereby certify that on June 28, 2019, a copy of the foregoing was filed electronically. Notice of this filing will be sent to all parties by operation of the Court's electronic filing system. Parties may access this filing through the Court's system.

/s/ Matthew S. Teetor

Matthew S. Teetor (0087009)